



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 20, 2015

BY ECF AND EMAIL

The Honorable J. Paul Oetken
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Suresh Hiranandaney et al.*, 14 Cr. 409 (JPO)

Dear Judge Oetken:

The Government writes, with the consent of all five defendants through their counsel, to respectfully request: (1) that guilty pleas be scheduled before the Court for defendants Suresh Hiranandaney, Lalit Chabria, and Anita Chabria at times convenient for the Court during or after the week of April 27, 2015; and (2) that the Court adjourn the next status conference in this case, currently scheduled for April 21, 2015, for 30 days.

With respect to defendants Suresh Hiranandaney, Lalit Chabria, and Anita Chabria, these three defendants have indicated that they intend to plead guilty under plea agreements with the Government that are expected to be finalized by April 24, 2015. Accordingly, the Government and these three defendants respectfully request that guilty pleas for these three defendants be scheduled before the Court at times convenient for the Court during or after the week of April 27, 2015.

As to the remaining defendants — Samir Hiranandaney and Seema Shah — the Government is engaged in active plea discussions with these two defendants, but the parties do not anticipate reaching a resolution as to these two defendants before the status conference scheduled for April 21, 2015.

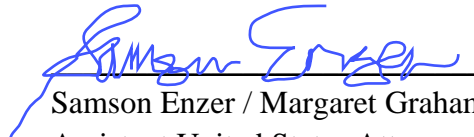
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In light of the foregoing, all the parties also jointly request a 30-day adjournment of the next status conference, and the exclusion of time under the Speedy Trial Act from April 21, 2015, until the date of the next conference, towards the ends of justice, to allow the continuation of the above-mentioned plea negotiations.

Respectfully submitted,

PREET BHARARA
United States Attorney

By:


Samson Enzer / Margaret Graham
Assistant United States Attorneys
(212) 637-2342 / -2923

cc: Andrew S. Rendeiro, Esq.
Douglas R. Jensen, Esq.
Robert John Aiello, Esq.
Michael Joseph Croce, Esq.
Glenn Morak, Esq.
(by ECF)